

RH 905-1



DOW CHEMICAL U.S.A.

June 6, 1980

MIDLAND, MICHIGAN 48640

DOCKET NUMBER PR-20 (35)
PROPOSED RULE (45 FR 18023)

Docketing & Service Branch
US Nuclear Regulatory Commission
Secretary of the Commission
Washington, DC 20555



Secretary of the Commission:

COMMENTS ON THE ADVANCED NOTICE OF PROPOSED RULEMAKING CONCERNING THE AMENDMENTS TO STANDARDS FOR PROTECTION AGAINST RADIATION AS APPEARING IN THE FEDERAL REGISTER, VOL 45, NO 58, 18023 (MARCH 20, 1980)

In issuing the captioned advance notice of proposed rulemaking in the Federal Register, Vol. 45, No. 58, 18023 (March 20, 1980), the NRC summarizes its intent as follows:

"The Nuclear Regulatory Commission (NRC) is considering a major revision to 10 CFR Part 20 of its regulations. The primary purpose of the revision is to bring NRC radiation protection standards into accord with developments in radiation protection that have occurred since promulgation of Part 20 in its present form in the late 1950's. In a preliminary review of this matter, the NRC staff has identified a number of areas in which Part 20 might be improved. Before proceeding further with specific structural and substantive proposed changes the NRC is seeking public comment. Of particular interest are public views on the areas so far identified by the staff as well as suggestions for alternative approaches for effecting needed improvements."

It is the understanding of The Dow Chemical Company (Dow) that the NRC continually reviews and revises 10 CFR Part 20 to maintain consistency with current radiation protection philosophies. Indeed, the NRC has amended Part 20 on numerous occasions in the past as additional scientific information has become available. It is the view of Dow that the NRC radiation protection standards have already been amended in "accord with developments in radiation protection" as stated in the preceding summary.

While it can be recognized that there may be sections of Part 20 that could be improved, many of the NRC proposed areas of improvement to Part 20 for establishment of a radiation protection program have already been incorporated into the existing Part 20 and the NRC issued Regulatory Guide Series. Specifically, for example, the ALARA principles and requirements of a radiation protection program have been clearly defined

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AN OPERATING UNIT OF THE DOW CHEMICAL COMPANY



Acknowledged by card. 6/19/80. mdu

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in 10 CFR 20.1(c) and the US NRC Regulatory Guide Series, Division 8, Occupational Health. These Regulatory Guides include 8.8, "Information Relevant to Ensuring that Occupational Radiation Exposure Will Be As Low As Reasonably Achievable;" 8.10, "Operating Philosophy for Maintaining Occupational Radiation Exposure As Low As Reasonably Achievable;" and 8.18, "Information Relevant to Ensuring that Occupational Radiation Exposure Will Be As Low As Reasonably Achievable."

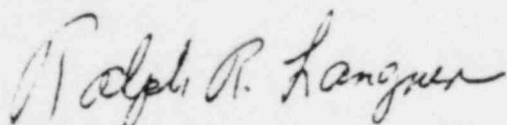
Because Part 20 has been routinely amended since its initial passage in the late 1950's and no new data has been presented to support the proposed NRC rewrite of Part 20, it is unclear as to the need to promulgate such regulations.

Therefore, Dow respectfully urges the NRC to either:

1. specifically identify the scientific and technical information used as the basis for rewriting Part 20 or
2. terminate agency action regarding this proposed rulemaking.

Two areas of Part 20 that do need improvement are the standard for individual occupational exposure and adoption of the Systeme Internationale (SI) Units. Individual Occupational Exposure limitations should be combined for internal and external exposures by adopting the ICRP recommendations for use of the effective dose equivalents. The SI units (i.e. greys, sieverts, and becquerels) should be adopted in replacement of the present system (i.e. rads, rems, and curies).

Sincerely,



R. R. Langner, Chairman
Radiation Safety Committee
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bjd